

ROBERT GUILD

Attorney at Law

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September 27, 2017

Ms. Jocelyn D. Boyd
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

In Re:

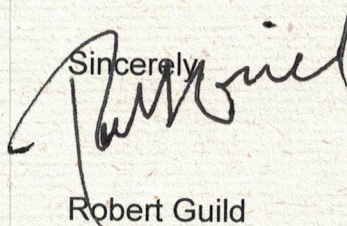
Request of the South Carolina Office of Regulatory Staff for Rate Relief to SCE&G
Rates Pursuant to S.C. Code Ann. § 58-27-920
Docket No. 2017-305--E

Dear Ms. Boyd:

Enclosed please find for filing and consideration the Petition to Intervene on behalf of Friends of the Earth and Sierra Club in the above-captioned matter, together with Certificate of Service reflecting service upon the parties.

With kind regards I am

Sincerely,



Robert Guild

Encl.s

CC: K. Chad Burgess, Esquire
Jeffrey M. Nelson, Esquire
Shannon Bowyer Hudson, Esquire



(Caption of Case)

In Re:

Request of the South Carolina Office of Regulatory
Staff for Rate Relief to SCE&G Rates Pursuant to S.C.
Code Ann. § 58-27-920

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2017 - 305 - E

(Please type or print)

Submitted by: Robert Guild

SC Bar Number: 2358

Telephone: (803) 917 573

Address: 314 Pall Mall Street

Fax:

Columbia, SC 29201

Other:

Email: bguild@mindspring.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☒ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2017-305-E

In Re:
Request of the South Carolina Office of
Regulatory Staff for Rate Relief to
SCE&G Rates Pursuant to S.C. Code
Ann. § 58-27-920

**PETITION TO INTERVENE BY
FRIENDS OF THE EARTH AND
SIERRA CLUB**

Friends of the Earth (FoE) and the Sierra Club (Sierra), on behalf of their members who will be adversely affected by the continued burden of unjust and unreasonable electric rates charged by South Carolina Electric & Gas Company (SCE&G), reserving all claims and rights asserted in their Complaint in Docket No. 2017-207-E, hereby petition the Commission pursuant to R. 103-825 of the Commission's Rules and Regulations to intervene and be made a party of record in the above-referenced proceeding. In support of this Petition to Intervene, Friends of the Earth and Sierra Club, groups which have challenged the prudence of this abandoned nuclear project since 2008, would respectfully show:

1. FoE is a non-profit environmental advocacy organization with members in all the 50 states including South Carolina and its headquarters in Washington, DC. FoE is affiliated with Friends of the Earth International, the world's largest environmental advocacy network with member organizations in 70 countries. FoE has worked for

over 40 years to promote a healthy and just world and has been a leading advocate for safe and sustainable energy. It has worked to show how it is possible to shift the U.S. and global economies to a cleaner energy basis, using the latest in efficiency improvements, along with renewable energy sources such as wind, geothermal, and solar power. Members of FoE are ratepayers of SCE&G and neighbors of the site of the subject nuclear facility. Members of FoE live, work, travel, recreate, use and enjoy natural resources in the vicinity of the subject nuclear facility. They breathe the air, drink and use the water, eat food grown in the vicinity of the project. FoE participated in the initial proceeding before this Commission opposing approval of this Project. FoE's members would be harmed by the continued construction of the subject Project and the alternative generation resources proposed by SCE&G because of unwarranted increases in their electric rates, reduced reliability of their electric service, risk to their health and safety and harm to their use and enjoyment of natural resources which will be adversely affected by the Project and proposed alternatives, the subsequent costs associated with this project, the cost recovery measures proposed by SCE&G for abandoned project costs and the costs associated with SCE&G's proposed replacement alternatives.

2. The Sierra Club is the oldest and largest non-profit grassroots environmental organization in the country with some 750,000 members, 65 Chapters, over 400 local groups. The South Carolina Chapter has seven local groups with more than 5,000 members across the state. The Club's mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the

quality of the natural and human environment; and to use all lawful means to carry out these objectives. The Club and its members actively promote safe energy solutions including energy efficiency and renewable energy resources to combat the climate crisis and to protect human health and the natural environment. The organization has been actively involved in several proceedings before this Commission regarding cost overruns and schedule delays involving this Project. The South Carolina Chapter of the Club has offices and meeting space at 1314 Lincoln Street, Columbia, South Carolina 29201. Members of the Sierra Club are customers of SCE&G who live, work, recreate and use natural resources near the existing Summer nuclear plant and the site of the proposed Project and pay electric rates related to the Project. Members of Sierra Club would be harmed by the continued construction of the subject Project and the alternative generation resources proposed by SCE&G because of unwarranted increases in their electric rates, reduced reliability of their electric service, risk to their health and safety and harm to their use and enjoyment of natural resources which will be adversely affected by the Project and proposed alternatives, the subsequent costs associated with this project, the cost recovery measures proposed by SCE&G for abandoned project costs and the costs associated with SCE&G's proposed replacement alternatives.

3. Pursuant to S.C. Code Sections 58-27-810, 58-27-960, 58-27-1930, 58-33-275(E), 58-33-280(k) and Rules R. 103-824 and 103-825 of the Commission's Rules and Regulations, FoE and Sierra have requested that the Commission consider and determine the imprudence of acts and omissions and costs incurred by SCE&G in connection with the V.C. Summer, Units 2 and 3 Nuclear Project considering the

information available at the time; consider and determine the prudence of abandonment of the subject Project and of the available least-cost efficiency and renewable energy alternatives; and remedy, abate and make due reparations for the unjust and unreasonable rates charged to ratepayers related thereto. FoE and Sierra Club have requested that the Commission limit recovery of Project abandonment costs and replacement of the Project with least-cost alternative resources such as comprehensive energy efficiency measures, and utility scale renewable generation. In addition, FoE and Sierra Club have request that the Commission determine just and reasonable rates associated with Project abandonment and the prudent alternatives to the Project, fairly and appropriately apportioning risk, cost and responsibility to SCE&G and its stockholders while protecting ratepayers from and ordering reparation for the unjust and unreasonable rate impacts of utility imprudence related to the Project.

WHEREFORE: For the foregoing reasons, Friends of the Earth and Sierra Club, on behalf of their members who will be adversely affected by the continued burden of unjust and unreasonable electric rates charged by South Carolina Electric & Gas Company, hereby petition the Commission pursuant to R. 103-825 of the Commission's Rules and Regulations to intervene and be made a party of record in the above-referenced proceeding; to permit full discovery and disclosure of the information available to SCE&G and the imprudence of acts, omissions and costs incurred by SCE&G bearing on this abandoned nuclear project; determine the prudent least-cost alternative replacement resources such as comprehensive energy efficiency measures, and utility scale renewable generation; and protect ratepayers from unjust and

unreasonable rates associated with the abandoned Project by ordering rate reparations and refunds; and for such other and further relief as may be just and reasonable.

September 27, 2017

A handwritten signature in black ink, appearing to read "Robert Guild", written over a horizontal line.

Robert Guild
314 Pall Mall
Columbia, South Carolina 29201

ATTORNEY FOR FRIENDS OF THE EARTH
AND SIERRA CLUB

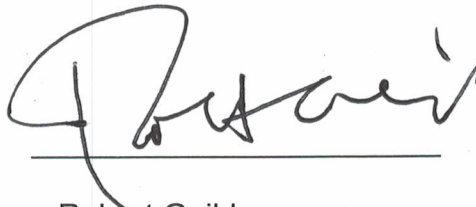
CERTIFICATE OF SERVICE

I hereby certify that on this date I served the above Petition to Intervene by placing copies of same in the United States Mail, first-class postage prepaid, addressed to:

K. Chad Burgess, Esquire
South Carolina Electric & Gas Company/SCANA
220 Operation Way - MC C222
Cayce, SC 29033-3701

Jeffrey M. Nelson, Esquire
Shannon Bowyer Hudson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

September 27, 2017

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Robert Guild